

## REMARKS

### I. Introduction

In response to the Decision on Appeal dated February 6, 2009, claims 1-12 have been cancelled, and new claims 13-27 have been added. Claims 13-27 are in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Prior Art Rejections

The Decision on Appeal affirmed the rejection of claims 1, 2, 5, 6, and 9-12 under 35 U.S.C. §102(e) as being anticipated by Frid et al., U.S. Patent No. 6,137,791 (Frid), and the rejection of claims 3, 4, 7, and 8 under 35 U.S.C. §103(a) as being unpatentable over Frid as applied to claim 1 and 6, and further in view of Olkkonen, WO 98/43456 (Olkkonen).

Applicants' attorney respectfully submits that new claims 13-27 overcome these rejections.

Independent claim 13 is generally directed to a system for integrating cellular telephone and internet protocol networks. The system includes a router for routing voice calls and data on both an internet protocol network and a cellular telephone network. The router converts the voice calls and data on the cellular telephone network into an internet protocol for transmission on the internet protocol network, and the router converts the voice calls and data on the internet protocol network into a cellular telephone protocol for transmission on the cellular telephone network. The system also includes at least one base transceiver station, directly coupled to the router using the cellular telephone network, for communicating the voice calls and data with a mobile telephone using radio frequency signals within a transmission area associated with the base transceiver station and for transferring the voice calls and data between the mobile telephone and the router. Finally, the system includes at least one home agent and foreign agent, both directly coupled to the router via the internet protocol network, for forwarding the voice calls and data to the mobile telephone based on an internet protocol address for the mobile telephone. In this regard, the home agent registers a mobile telephone with the foreign agent, the home agent tunnels the voice calls and data for the mobile telephone to the foreign agent through the router, and the foreign agent delivers the tunneled voice calls and data to the mobile telephone via the router using the internet protocol address for the mobile telephone.

The cited references do not teach nor suggest these various elements of Applicants' independent claim.

Frid merely describes a roaming mechanism enabling a mobile station to roam between a first data packet network utilizing a Mobile IP Method (MIM) and a second data packet network utilizing a Personal Digital Cellular Mobility Method (PMM) is disclosed. A foreign agent (FA) is introduced into the PMM network for enabling a mobile station associated with the MIM network and currently roaming within the PMM network to communicate packet data with an associated home agent (HA). A home agent (HA) is further introduced into the PMM network for enabling a mobile station associated with the PMM network and currently roaming within the MIM network to communicate packet data with an associated FA or Mobile IP Client Emulator (MICE) currently serving the roaming mobile station.

Olkkonen merely describes a mobile networks using Asynchronous Transfer Mode (ATM) transmission systems, and the control of mobility and call control functions in ATM systems. A network element (MSC/BSC) of a telecommunication network, such as a mobile network, which in a conventional telecommunication network architecture ensures the switching of circuit-switched connections, is provided with an ATM switching function. ATM switching functions are controlled with the same call and switching control operations (31) that are conventionally used e.g. for the control of a TDM switching field in a public land mobile network (PLMN) element. In a minimum implementation, an ATM switching field provided with a suitable control interface is simply arranged in place of or parallel with the time division multiplexing (TDM) switching field. The switching network element thus becomes an ATM network node of a physical or a logical interface layer. PLMN level signalling, mobility management and call control are implemented using solutions.

Thus, Applicants submit that independent claims 1, 6, and 12 are allowable over Frid and Olkkonen. Further, dependent claims 2-5 and 7-11 are submitted to be allowable over Frid and Olkkonen in the same manner, because they are dependent on independent claims 1, 6, and 12, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5 and 7-11 recite additional novel elements not shown by Frid and Olkkonen.

III. Conclusion

In view of the above, it is submitted that this application is in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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